

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

TINA LINDQUIST,

Plaintiff,

vs.

HEIM, L.P.,

Defendant.

Civil Action No: 04-249E

**JUDGE SEAN J. MC LAUGHLIN /
MAGISTRATE JUDGE SUSAN
PARADISE BAXTER**

Electronically Filed

PAUL R. ROBINSON, ESQUIRE
PA I.D. No. 65581

Meyer, Darragh, Buckler, Bebenek &
Eck, P.L.L.C.
U.S. Steel Tower, Suite 4850
600 Grant Street
Pittsburgh, PA 15219
(412) 261-6600

DEFENDANT'S EXPERT DISCLOSURES

AND NOW, comes the defendant, HEIM, L.P., through their counsel, MEYER, DARRAGH, BUCKLER, BEBENEK & ECK, P.L.L.C., disclosing the following expert witness information pursuant to Rule 26(a)(2) of the Federal Rules of Civil Procedure and this Honorable Court's November 29, 2005 Amended Case Management Order, as follows:

1. Gary Hutter, Ph.D., P.E., C.S.P.
Meridian Engineering & Technology, Inc.
PO Box 598
4228 Commercial Way
Glenview, IL 60025

Dr. Hutter's March 8, 2006 report, curriculum vitae, listing of publications authored by him in the last 10 years, listing of cases in which he has previously offered testimony in the last 4 years and fee schedule are attached hereto as Exhibit "A."

2. William Switalski, P.E.
Switalski Engineering, Inc.
4228 Commercial Way
Glenview, IL 60025

Mr. Switalski's March 13, 2006 report, curriculum vitae, listing of publications authored by him in the last 10 years, listing of cases in which he has previously offered testimony in the last 4 years and fee schedule are attached hereto as Exhibit "B."

3. Dennis R. Cloutier, C.S.P.
Cloutier Consulting Services
6624 Parkland Avenue
Cincinnati, OH 45233

Mr. Cloutier's March 13, 2006 report, curriculum vitae, listing of publications authored by him in the last 10 years, a listing of cases in which he has previously offered testimony in the last 4 years and fee schedule are attached hereto as Exhibit "C."

4. David A. Zak, M.E.D., C.R., L.P.C., C.L.C.P.
PO Box 88
Turtle Creek, PA 15145-0088

Mr. Zak's March 13, 2006 report, curriculum vitae, listing of cases in which he has previously offered testimony in the last 4 years and fee schedule are attached hereto as Exhibit "D."

Defendant reserves the right to amend these expert disclosures up to and including the time of trial.

Respectfully submitted,

MEYER, DARRAGH, BUCKLER,
BEBENEK & ECK, P.L.L.C.

Dated: March 16, 2006

By: /s/ Paul R. Robinson

PAUL R. ROBINSON, ESQUIRE
PA I.D. No. 65581
Counsel for Heim, L.P.

U.S. Steel Tower, Suite 4850
600 Grant Street
Pittsburgh, PA 15219
(412) 261-6600

PROOF OF SERVICE

This is to certify that a true and correct copy of the foregoing document has been served upon all parties on the date and in the manner listed below:

_____ First Class Mail, Postage Prepaid
_____ Certified Mail - Return Receipt Requested
_____ Hand Delivery
_____ Facsimile Transmission
X Electronic Filing

at the following address:

Dallas W. Hartman, Esquire
Dallas W. Hartman P.C.
2815 Wilmington Road
New Castle, PA 16105
(Counsel for Plaintiff)

MEYER, DARRAGH, BUCKLER,
BEBENEK & ECK, P.L.L.C.

Dated: March 16, 2006

/s/ Paul R. Robinson
PAUL R. ROBINSON, ESQUIRE
PA I.D. No. 65581